

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

- - - - - X
:
UNITED STATES OF AMERICA : SEALED INDICTMENT
:
- v. - :
: 19 Cr. 375
MARVIN WILLIAMS, :
:
CLIPHAS BELFON, :
a/k/a "Cliff," :
:
COLIN BURNETT, :
a/k/a "Greg," :
:
NICHOLAS DIXON, :
a/k/a "Robbie," :
:
BESAR ISMAILI, :
:
STEVEN KLEIN, :
:
ROBERT PINSKY, :
:
LASHAUMBA RANDOLPH, :
:
ANTONIO SANTIAGO, and :
:
CHARLES WALTON, :
:
Defendants. :
X
- - - - -

COUNT ONE
(Conspiracy to Transport, Receive, Possess,
and Sell Stolen Vehicles)

The Grand Jury charges:

Background

1. From in or about October 2017 through in or about
November 2018, MARVIN WILLIAMS, CLIPHAS BELFON, a/k/a "Cliff,"

COLIN BURNETT, a/k/a "Greg," NICHOLAS DIXON, a/k/a "Robbie," BESAR ISMAILI, STEVEN KLEIN, ROBERT PINSKY, LASHAUMBA RANDOLPH, ANTONIO SANTIAGO, and CHARLES WALTON, the defendants, together with others known and unknown: (1) obtained stolen vehicles from, among other places, Michigan and Florida; (2) transported the stolen vehicles to, among other places, the Southern District of New York and Connecticut, for resale; (3) created and/or obtained false titles, registrations, and temporary license plates for the stolen vehicles; (4) used the false vehicle records to deceive (a) buyers of the stolen vehicles, and/or (b) the South Dakota Department of Motor Vehicles, among other places, to obtain new titles and registrations for the stolen vehicles; and (5) used online markets, among other means, to solicit purchasers of the stolen vehicles in various states.

2. MARVIN WILLIAMS, CLIPHAS BELFON, a/k/a "Cliff," COLIN BURNETT, a/k/a "Greg," NICHOLAS DIXON, a/k/a "Robbie," BESAR ISMAILI, STEVEN KLEIN, ROBERT PINSKY, LASHAUMBA RANDOLPH, ANTONIO SANTIAGO, and CHARLES WALTON, the defendants, and others known and unknown, obtained, transported, and sold or attempted to sell approximately sixty stolen vehicles worth, in total, approximately \$3,700,000.

Statutory Allegations

3. From at least in or about October 2017 through in or about November 2018, in the Southern District of New York and

elsewhere, MARVIN WILLIAMS, CLIPHAS BELFON, a/k/a "Cliff," COLIN BURNETT, a/k/a "Greg," NICHOLAS DIXON, a/k/a "Robbie," BESAR ISMAILI, STEVEN KLEIN, ROBERT PINSKY, LASHAUMBA RANDOLPH, ANTONIO SANTIAGO, and CHARLES WALTON, the defendants, together with others known and unknown, unlawfully and knowingly did combine, conspire, confederate, and agree together and with each other to (1) unlawfully transport stolen motor vehicles, in violation of Title 18, United States Code, Section 2312, and (2) receive, possess, sell, and dispose of stolen motor vehicles, in violation of Title 18, United States Code, Section 2313.

4. It was a part and an object of the conspiracy that MARVIN WILLIAMS and NICHOLAS DIXON, a/k/a "Robbie," the defendants, and others known and unknown, would and did unlawfully transport in interstate commerce stolen motor vehicles, knowing the same to be stolen, in violation of Title 18, United States Code, Section 2312.

5. It was a further part and an object of the conspiracy that MARVIN WILLIAMS, CLIPHAS BELFON, a/k/a "Cliff," COLIN BURNETT, a/k/a "Greg," NICHOLAS DIXON, a/k/a "Robbie," BESAR ISMAILI, STEVEN KLEIN, ROBERT PINSKY, LASHAUMBA RANDOLPH, ANTONIO SANTIAGO, and CHARLES WALTON, and others known and unknown, would and did receive, possess, conceal, store, barter, sell, and dispose of stolen motor vehicles, which had crossed a State boundary after being stolen, knowing the same to be stolen, in violation of Title 18, United States Code, Section 2313.

OVERT ACTS

6. In furtherance of the conspiracy and to effect the illegal objects thereof, the following overt acts, among others, were committed in the Southern District of New York and elsewhere:

a. On or about July 3, 2018, MARVIN WILLIAMS and CLIPHAS BELFON, a/k/a "Cliff," the defendants, exchanged a series of text messages regarding WILLIAMS potentially buying a stolen Corvette and a stolen Cadillac from BELFON.

b. On or about July 12, 2018, STEVEN KLEIN, the defendant, met a purchaser for a stolen black 2014 BMW 435i at the Westchester County Airport in White Plains, New York.

c. On or about July 19, 2018, WILLIAMS operated a stolen white Lamborghini Huracan in the Southern District of New York.

d. On or about September 9, 2018, ROBERT PINSKY, the defendant, and WILLIAMS participated in a phone call in which PINSKY agreed to look for a buyer for a stolen CORVETTE that was in WILLIAMS's possession.

e. On or about September 14, 2018, LASHAUMBA RANDOLPH, the defendant, sent WILLIAMS a package containing fake documents for stolen vehicles.

f. On or about September 19, 2018, BESAR ISMAILI, the defendant, and WILLIAMS participated in a phone call in which they discussed purchasing and selling a stolen Rolls Royce.

g. On or about September 20, 2018, WILLIAMS participated a phone call with ANTONIO SANTIAGO, the defendant, in which they discussed WILLIAMS purchasing two stolen Land Rover Range Rovers from SANTIAGO.

h. On or about September 20, 2018, NICHOLAS DIXON, a/k/a "Robbie," the defendant, met an individual, who was there on behalf of WILLIAMS, in Tamarac, Florida, where DIXON provided that individual with two stolen black Land Rover Range Rovers.

i. On or about October 15, 2018, WILLIAMS and COLIN BURNETT, a/k/a "Greg," the defendant, exchanged a series of text messages in which they discussed WILLIAMS purchasing a fake title for a blue Dodge Charger Hellcat from BURNETT.

j. On or about October 24, 2018, WILLIAMS and CHARLES WALTON, the defendant, exchanged a series of text messages regarding a stolen Jeep Wrangler that WALTON said had a manufacturer's suggested retail price of \$72,000 but which WALTON offered to sell to WILLIAMS for \$13,000.

(Title 18, United States Code, Section 371.)

COUNT TWO
(Conspiracy to Commit Wire Fraud)

The Grand Jury further charges:

Background

7. The allegations set forth in paragraphs 1 and 2 are repeated and realleged as if set forth fully herein.

8. MARVIN WILLIAMS, COLIN BURNETT, a/k/a "Greg," BESAR ISMAILI, STEVEN KLEIN, and LASHAUMBA RANDOLPH, the defendants, and others known and unknown, engaged in a scheme to defraud car purchasers by misrepresenting, via text messages, phone calls, online advertisements, and other means, the origins, legal status, and identifying information of stolen vehicles.

9. In particular, MARVIN WILLIAMS, BESAR ISMAILI, and STEVEN KLEIN, the defendants, and others known and unknown, falsely represented to the purchasers of certain cars that those cars were not stolen and had legitimate origins. WILLIAMS, ISMAILI, and KLEIN, together with others known and unknown, provided false vehicle identification numbers ("VINS"), titles, and bills of sale to the purchasers.

10. COLIN BURNETT and LASHAUMBA RANDOLPH, the defendants, provided MARVIN WILLIAMS, the defendant, and others known and unknown, with false titles, false VINS, and false VIN labels and/or plates, that were used in connection with the sale of stolen vehicles.

Statutory Allegations

11. From in or about October 2017 through in or about November 2018, in the Southern District of New York and elsewhere, MARVIN WILLIAMS, COLIN BURNETT, a/k/a "Greg," BESAR ISMAILI, STEVEN KLEIN, and LASHAUMBA RANDOLPH, the defendants, together with others known and unknown, willfully and knowingly did combine,

conspire, confederate, and agree together and with each other to commit wire fraud, in violation of Title 18, United States Code, Section 1343.

12. It was a part and an object of the conspiracy that MARVIN WILLIAMS, COLIN BURNETT, a/k/a "Greg," BESAR ISMAILI, STEVEN KLEIN, and LASHAUMBA RANDOLPH, the defendants, and others known and unknown, willfully and knowingly, having devised and intending to devise a scheme and artifice to defraud and for obtaining money and property by means of false and fraudulent pretenses, representations, and promises, would and did transmit and cause to be transmitted by means of wire in interstate commerce, writings, signs, signals, pictures, and sounds for the purpose of executing such scheme and artifice, in violation of Title 18, United States Code, Section 1343.

(Title 18, United States Code, Section 1349.)

COUNT THREE
(Wire Fraud)

The Grand Jury further charges:

13. The allegations set forth in paragraphs 1, 2, and 8 through 10 are repeated and realleged as if set forth fully herein.

14. From in or about October 2017 through in or about November 2018, in the Southern District of New York and elsewhere, MARVIN WILLIAMS, COLIN BURNETT, a/k/a "Greg," BESAR ISMAILI, STEVEN KLEIN, and LASHAUMBA RANDOLPH, the defendants, willfully

and knowingly, having devised and intending to devise a scheme and artifice to defraud and for obtaining money and property by means of false and fraudulent pretenses, representations, and promises, and attempting to do so, did transmit and cause to be transmitted by means of wire in interstate commerce, writings, signs, signals, pictures, and sounds for the purpose of executing such scheme and artifice, to wit, WILLIAMS, BURNETT, ISMAILI, KLEIN, and RANDOLPH, received and attempted to receive wire transfers, and deposited cash and checks, using a bank account located in the Southern District of New York and controlled by WILLIAMS, from purchasers of stolen vehicles to whom WILLIAMS, KLEIN, and ISMAILI had made false and misleading misrepresentations regarding the vehicles' origins, legal status, and identifying information, and aided and abetted the same.

(Title 18, United States Code, Sections 1343 and 2.)

COUNT FOUR
(Sale of Stolen Vehicles)

The Grand Jury further charges:

15. In or about December 2017, in the Southern District of New York and elsewhere, MARVIN WILLIAMS, the defendant, did receive, possess, conceal, store, barter, sell, and dispose of two stolen motor vehicles, which vehicles had crossed a State boundary after being stolen, knowing the vehicles to have been stolen, to wit, WILLIAMS sold a stolen blue 2017 Nissan Titan bearing a VIN

ending in 9399 and a red 2017 Nissan Titan bearing a VIN ending in 4751, both of which had been transported from Florida, to individuals residing in the Southern District of New York, and aided and abetted the same.

(Title 18, United States Code, Sections 2313 and 2.)

COUNT FIVE
(Possession of a Stolen Vehicle)

The Grand Jury further charges:

16. From in or about May 2018 through in or about September 2018, in the Southern District of New York and elsewhere, MARVIN WILLIAMS and LASHAUMBA RANDOLPH, the defendants, did receive, possess, conceal, store, barter, sell, and dispose of a stolen motor vehicle, which vehicle had crossed a State boundary after being stolen, knowing the vehicles to have been stolen, to wit, WILLIAMS and RANDOLPH possessed a stolen white 2016 Chevrolet Corvette bearing a VIN ending in 8750, which had been transported from Florida, in the vicinity of White Plains, New York, and aided and abetted the same.

(Title 18, United States Code, Sections 2313 and 2.)

COUNT SIX
(Sale of a Stolen Vehicle)

The Grand Jury further charges:

17. In or about July 2018, in the Southern District of New York and elsewhere, MARVIN WILLIAMS, COLIN BURNETT, a/k/a "Greg," and STEVEN KLEIN, the defendants, did receive, possess, conceal,

store, barter, sell, and dispose of a stolen motor vehicle, which vehicle had crossed a State boundary after being stolen, knowing the vehicle to have been stolen, to wit, WILLIAMS, BURNETT, and KLEIN met with the purchaser of a stolen black 2014 BMW 435i bearing a VIN ending in 1110 in the Southern District of New York, and aided and abetted the same.

(Title 18, United States Code, Sections 2313 and 2.)

COUNT SEVEN
(Possession of a Stolen Vehicle)

The Grand Jury further charges:

18. From in or about July 2018 through in or about November 2018, in the Southern District of New York and elsewhere, MARVIN WILLIAMS and STEVEN KLEIN, the defendants, did receive, possess, conceal, store, barter, sell, and dispose of a stolen motor vehicle, which vehicle had crossed a State boundary after being stolen, knowing the vehicles to have been stolen, to wit, WILLIAMS and KLEIN possessed a stolen white Lamborghini Huracan bearing a VIN ending in 0864, which had been transported from Florida, in the Southern District of New York, and aided and abetted the same.

(Title 18, United States Code, Sections 2313 and 2.)

COUNT EIGHT
(Transportation of Stolen Vehicles)

The Grand Jury further charges:

19. From on or about September 21, 2018 through on or about September 22, 2018, in the Southern District of New York and

elsewhere, MARVIN WILLIAMS, NICHOLAS DIXON, a/k/a "Robbie," and ANTONIO SANTIAGO, the defendants, did transport in interstate commerce two stolen motor vehicles, knowing the vehicles to have been stolen, to wit, WILLIAMS, DIXON, and SANTIAGO transported a stolen black 2018 Land Rover Range Rover bearing a VIN ending in 7428, and a stolen black 2015 Land Rover Range Rover bearing a VIN ending in 8398, from Florida, through the Southern District of New York, to Connecticut, and aided and abetted the same.

(Title 18, United States Code, Sections 2312 and 2.)

COUNT NINE
(Sale of a Stolen Vehicle)

The Grand Jury further charges:

20. In or about October 2018, in the Southern District of New York and elsewhere, MARVIN WILLIAMS, COLIN BURNETT, a/k/a "Greg," and LASHAUMBA RANDOLPH, the defendants, did receive, possess, conceal, store, barter, sell, and dispose of a stolen motor vehicle, which vehicle had crossed a State boundary after being stolen, knowing the vehicles to have been stolen, to wit, WILLIAMS, BURNETT, and RANDOLPH sold a stolen blue 2018 Dodge Charger Hellcat bearing a VIN ending in 7036, which had been transported from Michigan, to an individual who resided in the Bronx, New York, and aided and abetted the same.

(Title 18, United States Code, Sections 2313 and 2.)

FORFEITURE ALLEGATIONS AS TO
COUNTS ONE THROUGH NINE

21. As a result of committing the offenses alleged in Counts One, Two, Three, Four Five, Six, Seven, Eight, and Nine of this Indictment, MARVIN WILLIAMS, CLIPHAS BELFON, a/k/a "Cliff," COLIN BURNETT, a/k/a "Greg," NICHOLAS DIXON, a/k/a "Robbie," BESAR ISMAILI, STEVEN KLEIN, ROBERT PINSKY, LASHAUMBA RANDOLPH, ANTONIO SANTIAGO, and CHARLES WALTON, the defendants, shall forfeit to the United States, pursuant to Title 18, United States Code, Section 981(a)(1)(C) and Title 28, United States Code, Section 2461(c), any and all property, real and personal, that constitutes or is derived from proceeds traceable to the commission of said offenses, including but not limited to a sum of money in United States currency representing the amount of proceeds traceable to the commission of said offenses.

Substitute Assets Provision

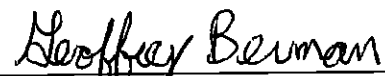
22. If any of the above-described forfeitable property, as a result of any act or omission of the defendants:

- a. cannot be located upon the exercise of due diligence;
- b. has been transferred or sold to, or deposited with, a third person;
- c. has been placed beyond the jurisdiction of the Court;
- d. has been substantially diminished in value; or
- e. has been commingled with other property which cannot be subdivided without difficulty;

it is the intent of the United States, pursuant to Title 21, United States Code, Section 853(p) and Title 28, United States Code, Section 2461(c), to seek forfeiture of any other property of the defendant up to the value of the above forfeitable property.

(Title 18, United States Code, Sections 981;
Title 21, United States Code, Section 853; and
Title 28, United States Code, Section 2461.)


FOREPERSON


GEOFFREY S. BERMAN
United States Attorney

Form No. USA-33s-274 (Ed. 9-25-58)

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

UNITED STATES OF AMERICA

v.

MARVIN WILLIAMS,
CLIPHAS BELFON, a/k/a "Cliff,"
COLIN BURNETT, a/k/a "Greg,"
NICHOLAS DIXON, a/k/a "Robbie,"
BESAR ISMAILI,
STEVEN KLEIN,
ROBERT PINSKY,
LASHAUMBA RANDOLPH,
ANTONIO SANTIAGO, and
CHARLES WALTON,


Defendants.

SEALED INDICTMENT

19 Cr.

(18 U.S.C. §§ 371, 1343, 1349, 2312,
2313, and 2.)

GEOFFREY S. BERMAN
United States Attorney


Foreperson
